

**Devon Zastrow Newman**, OSB #014627

Email: dneuman@schwabe.com

**Catherine B. Brinkman**, OSB #002134

Email: cbrinkman@schwabe.com

SCHWABE, WILLIAMSON & WYATT, P.C.

1211 SW 5th Ave., Suite 1900

Portland, OR 97204

Telephone: 503-222-9981

Facsimile: 503-796-2900

**Paul N. Tauger**, *appearing pro hac vice*

Email: pnt@eclipsegrp.com

**Anna M. Vradenburgh**, *appearing pro hac vice*

Email: amv@eclipsegrp.com

THE ECLIPSE GROUP LLP

2020 Main Street, Suite 600

Irvine, CA 92614

Telephone: 949-851-5000 ext. 110

Facsimile: 949-851-5051

Attorneys for Defendant Tenza Trading Ltd.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

**CALISTA ENTERPRISES LTD**, a  
Republic of Seychelles Company,

Plaintiff,

vs.

**TENZA TRADING LTD.**, a Cyprus  
Company,

Defendant.

No. 3:13-cv-01045-SI

MEMORANDUM IN SUPPORT OF JOINT  
STIPULATED MOTION TO EXTEND  
EXPERT DEADLINES

Tenza Trading Ltd. (hereafter “Tenza”) and Calista Enterprises, Ltd. (hereafter “Calista”) submit this Memorandum in Support of their Joint Stipulated Motion to Extend Expert Deadlines.

The parties request a brief extension of two weeks for each of the current expert discovery deadlines to accommodate Calista’s need for additional time to provide certain information related to Tenza’s claim for damages. Pursuant to LR 16-3, and given the stipulation from opposing counsel, Tenza respectfully requests a two-week extension to the following deadlines:

<b>PRESENT DEADLINE</b>	<b>PROPOSED DEADLINE</b>
Opening Expert Reports Due – 3/14/2014	March 28, 2014
Rebuttal Expert Reports Due – 3/28/2014	April 11, 2014
Expert Depositions Completion Deadline – 4/18/2014	May 2, 2014

This motion is made in good faith and not for purposes of delay. The requested extension

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will not require any modifications to any other case management dates that have been set by the Court.

Dated this 28<sup>th</sup> day of February, 2014.

Respectfully submitted,

s/ Devon Zastrow Newman

Paul N. Tauger, *appearing pro hac vice*  
Anna M. Vradenburgh, *appearing pro hac vice*  
THE ECLIPSE GROUP LLP  
Telephone: 949-851-5000 ext. 110  
Facsimile: 949-851-5051

Devon Zastrow Newman, OSB #014627  
Catherine B. Brinkman, OSB #002134  
SCHWABE, WILLIAMSON & WYATT, P.C.  
Telephone: 503-222-9981  
Facsimile: 503-796-2900

Attorneys for Defendant Tenza Trading Ltd.

s/ Matthew Shayefar

Matthew Shayefar, *appearing pro hac vice*  
Valentin David Gurvits, *appearing pro hac vice*  
BOSTON LAW GROUP, PC  
Telephone: 617-928-1806  
Facsimile: 617-928-1802

Sean Ploen, *appearing pro hac vice*  
PLOEN LAW FIRM, PC  
Telephone: 651-894-6800  
Facsimile: 651-894-6801

Thomas Freedman, Jr., OSB #080697  
PEARL LAW LLC  
Telephone: 503-295-6296

Attorneys for Plaintiff Calista Enterprises Ltd.